

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF LOUISIANA
MONROE DIVISION**

STATE OF MISSOURI ex rel. ERIC S.
SCHMITT, Attorney General,

STATE OF LOUISIANA ex rel. JEFFREY
M. LANDRY, Attorney General,
DR. JAYANTA BHATTACHARYA,
JILL HINES,
JIM HOFT,
DR. AARON KHERIATY, and
DR. MARTIN KULLDORFF,

Plaintiffs,

v.

JOSEPH R. BIDEN, JR., in his official
capacity as President of the United States;

KARINE JEAN-PIERRE, in her official
capacity as White House Press Secretary;

VIVEK H. MURTHY, in his official
capacity of Surgeon General of the United
States;

XAVIER BECERRA, in his official
capacity as Secretary of the Department of
Health and Human Services;

DEPARTMENT OF HEALTH AND
HUMAN SERVICES;

DR. ANTHONY FAUCI, in his official
capacity as Director of the National Institute
of Allergy and Infectious Diseases and as
Chief Medical Advisor to the President;

NATIONAL INSTITUTE OF ALLERGY
AND INFECTIOUS DISEASES;

CENTERS FOR DISEASE CONTROL
AND PREVENTION;

No. 3:22-cv-01213-TAD-KDM

CAROL Y. CRAWFORD, in her official capacity as Chief of the Digital Media Branch of the Division of Public Affairs within the Centers for Disease Control and Prevention;

UNITED STATES CENSUS BUREAU,
a.k.a. BUREAU OF THE CENSUS;

JENNIFER SHOPKORN, in her official capacity as Senior Advisor for Communications with the U.S. Census Bureau;

DEPARTMENT OF COMMERCE;

ALEJANDRO MAYORKAS, in his official capacity as Secretary of the Department of Homeland Security;

ROBERT SILVERS, in his official capacity as Under Secretary of the Office of Strategy, Policy, and Plans, within DHS;

SAMANTHA VINOGRAD, in her official capacity as Senior Counselor for National Security in the Office of the Secretary for DHS;

DEPARTMENT OF HOMELAND
SECURITY;

JEN EASTERLY, in her official capacity as Director of the Cybersecurity and Infrastructure Security Agency;

CYBERSECURITY AND
INFRASTRUCTURE SECURITY
AGENCY;

GINA McCARTHY, in her official capacity as White House National Climate Advisor, and

NINA JANKOWICZ, in her official capacity as director of the so-called “Disinformation Governance Board” within the Department of Homeland Security,

ANDREW SLAVITT, in his official capacity as White House Senior COVID-10 Advisor,

ROB FLAHERTY, in his official capacity as Deputy Assistant to the President and Director of Digital Strategy at the White House,

COURTNEY ROWE, in her official capacity as White House Covid-19 Director of Strategic Communications and Engagement,

CLARKE HUMPHREY, in her official capacity as White House Digital Director for the Covid-19 Response Team,

BENJAMIN WAKANA, in his official capacity as the Deputy Director of Strategic Communications and Engagement at the White House COVID-19 Response Team,

SUBHAN CHEEMA, in his official capacity as Deputy Director for Strategic Communications and External Engagement for the White House Covid-19 Response Team,

DORI SALCIDO, in her official capacity as White House Covid-19 Director of Strategic Communications and Engagement,

TIMOTHY W. MANNING, in his official capacity as White House Covid-19 Supply Coordinator,

DANA REMUS, in her official capacity as Counsel to the President,

AISHA SHAH, in her official capacity as White House Partnerships Manager,

LAURA ROSENBERGER, in her official capacity as Special Assistant to the President,

MINA HSIANG, in her official capacity as Administrator of the U.S. Digital Service

within the Office of Management and Budget in the Executive Office of the President,

U.S. DEPARTMENT OF JUSTICE,

FEDERAL BUREAU OF INVESTIGATION,

LAURA DEHMLOW, in her official capacity as Section Chief for the FBI's Foreign Influence Task Force,

ELVIS M. CHAN, in his official capacity as Supervisory Special Agent of Squad CY-1 in the San Francisco Division of the Federal Bureau of Investigation,

JAY DEMPSEY, in his official capacity as Social Media Team Lead, Digital Media Branch, Division of Public Affairs at the CDC,

KATE GALATAS, in her official capacity as Deputy Communications Director at the CDC,

ERIC WALDO, in his official capacity as Chief Engagement Officer for the Surgeon General,

YOLANDA BYRD, in her official capacity as a member of the Digital Engagement Team at HHS,

CHRISTY CHOI, in her official capacity as Deputy Director, Office of Communications, HRSA within HHS,

TERICKA LAMBERT, in her official capacity as Director of Digital Engagement at HHS and Deputy Director of the Office of Digital Strategy at the White House,

JOSHUA PECK, in his official capacity as Deputy Assistant Secretary for Public

Engagement at HHS,

JANELL MUHAMMED, in her official capacity as Deputy Digital Director at HHS,

MATTHEW MASTERSON, in his official capacity as Senior Cybersecurity Advisory within CISA in the Department of Homeland Security,

LAUREN PROTENTIS, in her official capacity as an official of CISA,

GEOFFREY HALE, in his official capacity as an official of CISA,

ALLISON SNELL, in her official capacity as an official of CISA,

KIM WYMAN, in her official capacity as CISA's Senior Election Security Lead,

BRIAN SCULLY, in his official capacity as an official of DHS and CISA,

ZACHARY HENRY SCHWARTZ, in his official capacity as Division Chief for the Communications Directorate at the U.S. Census Bureau,

LORENA MOLINA-IRIZARRY, in her official capacity as an official of the Census Bureau,

KRISTIN GALEMORE, in her official capacity as Deputy Director of the Office of Faith Based and Neighborhood Partnerships at the Census Bureau,

U.S. FOOD AND DRUG
ADMINISTRATION,

ERICA JEFFERSON, in her official capacity as Associate Commissioner for External Affairs within the Office of the Commissioner at the U.S. Food and Drug

Administration,

MICHAEL MURRAY, in his official capacity as Acquisition Strategy Program Manager for the Office of Health Communications and Education at the FDA,

BRAD KIMBERLY, in his official capacity as Director of Social Media at the FDA,

U.S. DEPARTMENT OF STATE,

LEAH BRAY, in her official capacity as Acting Coordinator of the State Department's Global Engagement Center,

SAMARUDDIN K. STEWART, in his official capacity as Senior Technical Advisor and/or Senior Advisor for the Global Engagement Center of the State Department,

DANIEL KIMMAGE, in his official capacity as Acting Coordinator for the Global Engagement Center at the State Department,

ALEXIS FRISBIE, in her official capacity as a member of the Technology Engagement Team at the Global Engagement Center at the State Department,

U.S. DEPARTMENT OF TREASURY,

WALLY ADEYEMO, in his official capacity as Deputy Secretary of the Treasury,

U.S. ELECTION ASSISTANCE COMMISSION,

MARK A. ROBBINS, in his official capacity as Interim Executive Director of the EAC, and

KRISTEN MUTHIG, in her official
capacity as Director of Communications for
the EAC,

Defendants.

PROOF OF SERVICE OF SECOND AMENDED COMPLAINT

The undersigned certifies that on the 8th day of October, 2022, service of Plaintiffs' Second Amended Complaint was accepted by counsel for Defendants via email on behalf of all newly named Defendants as follows:

1. **ANDREW SLAVITT**, in his official capacity as White House Senior COVID-10 Advisor,
2. **ROB FLAHERTY**, in his official capacity as Deputy Assistant to the President and Director of Digital Strategy at the White House,
3. **COURTNEY ROWE**, in her official capacity as White House Covid-19 Director of Strategic Communications and Engagement,
4. **CLARKE HUMPHREY**, in her official capacity as White House Digital Director for the Covid-19 Response Team,
5. **BENJAMIN WAKANA**, in his official capacity as the Deputy Director of Strategic Communications and Engagement at the White House COVID-19 Response Team,
6. **SUBHAN CHEEMA**, in his official capacity as Deputy Director for Strategic Communications and External Engagement for the White House Covid-19 Response Team,
7. **DORI SALCIDO**, in her official capacity as White House Covid-19 Director of Strategic Communications and Engagement,
8. **TIMOTHY W. MANNING**, in his official capacity as White House Covid-19 Supply Coordinator,
9. **DANA REMUS**, in her official capacity as Counsel to the President,
10. **AISHA SHAH**, in her official capacity as White House Partnerships Manager,
11. **LAURA ROSENBERGER**, in her official capacity as Special Assistant to the

President,

12. **MINA HSIANG**, in her official capacity as Administrator of the U.S. Digital Service within the Office of Management and Budget in the Executive Office of the President,
13. **U.S. DEPARTMENT OF JUSTICE**,
14. **FEDERAL BUREAU OF INVESTIGATION**,
15. **LAURA DEHMLOW**, in her official capacity as Section Chief for the FBI's Foreign Influence Task Force,
16. **ELVIS M. CHAN**, in his official capacity as Supervisory Special Agent of Squad CY-1 in the San Francisco Division of the Federal Bureau of Investigation,
17. **JAY DEMPSEY**, in his official capacity as Social Media Team Lead, Digital Media Branch, Division of Public Affairs at the CDC,
18. **KATE GALATAS**, in her official capacity as Deputy Communications Director at the CDC,
19. **ERIC WALDO**, in his official capacity as Chief Engagement Officer for the Surgeon General,
20. **YOLANDA BYRD**, in her official capacity as a member of the Digital Engagement Team at HHS,
21. **CHRISTY CHOI**, in her official capacity as Deputy Director, Office of Communications, HRSA within HHS,
22. **TERICKA LAMBERT**, in her official capacity as Director of Digital Engagement at HHS and Deputy Director of the Office of Digital Strategy at the White House,
23. **JOSHUA PECK**, in his official capacity as Deputy Assistant Secretary for Public Engagement at HHS,
24. **JANELL MUHAMMED**, in her official capacity as Deputy Digital Director at HHS,
25. **MATTHEW MASTERSON**, in his official capacity as Senior Cybersecurity Advisory within CISA in the Department of Homeland Security,
26. **LAUREN PROTENTIS**, in her official capacity as an official of CISA,
27. **GEOFFREY HALE**, in his official capacity as an official of CISA,
28. **ALLISON SNELL**, in her official capacity as an official of CISA,

29. **KIM WYMAN**, in her official capacity as CISA's Senior Election Security Lead,
30. **BRIAN SCULLY**, in his official capacity as an official of DHS and CISA,
31. **ZACHARY HENRY SCHWARTZ**, in his official capacity as Division Chief for the Communications Directorate at the U.S. Census Bureau,
32. **LORENA MOLINA-IRIZARRY**, in her official capacity as an official of the Census Bureau,
33. **KRISTIN GALEMORE**, in her official capacity as Deputy Director of the Office of Faith Based and Neighborhood Partnerships at the Census Bureau,
34. **U.S. FOOD AND DRUG ADMINISTRATION**,
35. **ERICA JEFFERSON**, in her official capacity as Associate Commissioner for External Affairs within the Office of the Commissioner at the U.S. Food and Drug Administration,
36. **MICHAEL MURRAY**, in his official capacity as Acquisition Strategy Program Manager for the Office of Health Communications and Education at the FDA,
37. **BRAD KIMBERLY**, in his official capacity as Director of Social Media at the FDA,
38. **U.S. DEPARTMENT OF STATE**,
39. **LEAH BRAY**, in her official capacity as Acting Coordinator of the State Department's Global Engagement Center,
40. **SAMARUDDIN K. STEWART**, in his official capacity as Senior Technical Advisor and/or Senior Advisor for the Global Engagement Center of the State Department,
41. **DANIEL KIMMAGE**, in his official capacity as Acting Coordinator for the Global Engagement Center at the State Department,
42. **ALEXIS FRISBIE**, in her official capacity as a member of the Technology Engagement Team at the Global Engagement Center at the State Department,
43. **U.S. DEPARTMENT OF TREASURY**,
44. **WALLY ADEYEMO**, in his official capacity as Deputy Secretary of the Treasury,
45. **U.S. ELECTION ASSISTANCE COMMISSION**,
46. **MARK A. ROBBINS**, in his official capacity as Interim Executive Director of the EAC, and

47. **KRISTEN MUTHIG**, in her official capacity as Director of Communications for the EAC.

All other Defendants received service by ECF notification, and thus all Defendants have received service of the Second Amended Complaint.

Dated: October 18, 2022

Respectfully submitted,

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Attorney General of Louisiana

/s/ D. John Sauer

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/s/ John C. Burns

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Counsel for Plaintiff Jim Hoft

* admitted *pro hac vice*

CERTIFICATE OF SERVICE

I hereby certify that on October 18, 2022, I caused a true and correct copy of the foregoing to be filed by the Court's electronic filing system, to be served by operation of the Court's electronic filing system on counsel for all parties.

/s/ D. John Sauer